

Ketchikan Misty Fjords Ranger District

Attn: Vallenar Young-Growth Project

3031 Tongass Avenue,

Ketchikan, AK 99901

7/12/2017

Below is a Sept. 2000 photo of a spruce stump, probably ~six feet in diameter, seen alongside the Vallenar Bay logging road from the 1950s. Note the dark understory still evident after fifty years.



Because of similarity of issues between USFS's Vallenar Young Growth Project and the State of Alaska's Vallenar Bay Timber

Sale, I've copied and pasted below, slightly edited, in their entirety my 2015 comments to the State.

State of Alaska

Division of Forestry

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Ketchikan, AK 99901

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Attn: Greg Staunton/Project Manager

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Subject: Vallenar Bay Timber Sale

Following are some general concerns upon which I would like to expand regarding state forests and timber sales, specifically those on Gravina Island.

I could not find in the PBIF a total mileage of road or number of bridges needed for this project. It appears there will be at least a dozen miles of road construction to access only 600 acres of harvestable timber? "The DOF estimates the cost of access to be close to the overall value of the timber described as operable in the area" (p15). Sounds like there are ulterior motives to this road construction, not least of which is an effort to expand the Ketchikan Borough's roaded footprint. Makes one wonder if some speculating landowners in Vallenar Bay have friends in high places. Since we haven't defined funding sources for future maintenance (p10) I'm left to presume the Ketchikan Borough plans to raise property taxes to keep this road open.

There are several references to "mature" and "maturing" young growth. Which is it? Sounds as if the DOF has every intention of cutting second growth before it's reached its optimum mean annual increment.

It also looks like our Republican state legislature takes some of its marching orders from ALEC (American Legislative Exchange Council) in an attempt to get federal lands turned over to states knowing full well the states will need to have fire sales to liquidate resources on those lands because states can't afford operating costs otherwise.

"...locate the road higher on the hillside and consequently avoid anadromous habitat altogether" (p9). I think I heard an almost identical statement from proponents of the Lewis Reef road. Yet, a major bridge crosses Lewis Creek a few dozen yards above tidewater over that anadromous stream.

And while I'm on the subject of language employed to make a not-so – benign project seem more palatable, I find the words "decadent" and "working forest". Decay has been an integral part of healthy forests for millennia, playing a huge role in creating the very conditions that render old growth forest structure so valuable to animal and plant diversity as well as fine-grained wood for human use. "Working forest" ignores ecosystem services that forests provide: Holding snow and water, moderating stream temperatures, erosion control, wildlife habitat, diversity, etc.

Inherent in the forest management discussion regarding transition to young growth is a presumption of scale that excludes micro-operators like myself. I repeatedly hear the comment that I would not even be able to exist as a small sawmill operator had a large-scale timber industry not been there to enable me.

Indeed, this argument is continually being manifested in the memos that come down from on high in the Forest Service, the State and the Native corporations. If a small wood products business is not employing several if not dozens of workers, and it's not cutting down trees, that business from all appearances is not even on the forest managers' radars.

For example, on the very first page of the USFS's Saddle Lakes DEIS they say the industry's long-term survival in Southeast Alaska

requires a transition from a dependence on old growth timber to a program that is primarily supported by young growth. Well, my timber business, a small sawmill operation, obtains most of its wood from log salvage and most of those logs that I salvage have been blown down or landslide borne old growth that make it to saltwater.

Over the 30+ years that I have been operating my Mobile Dimension mill people are still wanting red cedar decking, red cedar siding, spruce framing, wood for art projects and a host of other dimension lumber orders that I have been able to deliver.

The existence of my mill and my markets for wood depend little upon any timber sales the Forest Service or the State does or is planning on doing. From my perspective, the duration and scale at which old-growth harvest will be needed is quite clear, i.e., I don't see any significant decline in the future demand for the kinds of dimension lumber that I am able to provide. Nor do I foresee a significant natural decline in the availability of blow downs and landslide generated old growth. Indeed, with global warming there may well be more wind events to bring down salvageable trees. From my perspective public land managers should probably be dedicating some effort to streamlining access to dead/down timber.

When the public land managers say they need to develop a viable strategy for transitioning to young growth forest management they are speaking to a totally different constituency than operations like mine. When those managers speak of providing a dependable and economically competitive supply of timber for domestic and export markets they are not speaking to me. They are instead speaking to proponents of the unsustainable timber industry of a bygone era.

It's ironic the State has dedicated millions to "Roads to Resources" for projects like the Vallenar Bay roads and Shelter Cove roads while now they're talking of eliminating local services, e.g., some ferry runs, teaching positions, law enforcement and state offices like the local state recording office.

Immediately below are some decade-old images of results of previous timber sales on Gravina, the first two showing merchantable yellow cedar abandoned in the woods from AMHT's heli-logging, the third a barge of red cedar destined to be shipped out of the borough and likely the state as well. (Neither Seley nor Dahlstrom got this cedar.)

These are activities apparently allowed under Alaska State Forest Practices Act and other pertinent state rules.



Nanna, our St. Bernard stands on one of numerous smaller merchantable yellow cedar logs, this one a “buckskin abandoned in the woods by the recent helicopter logging operation on Gravina





A merchantable yellow cedar log left in the woods by the recent helicopter logging. For scale the hunting rifle is about 44" long.



Below: Log barge being loaded with cedar near Lewis Reef.



I have resided for varying periods of time at a semi-remote homestead acquired by my mother at Vallenar Point on the northwest end of Gravina Island since 1956. I also commuted by small boat in the early 1960s across Tongass Narrows to get to high school from a small farm/home site that was razed for the building of the Ketchikan airport.

I've worked in the commercial fishing industry since my early teens. I've also owned and operated a small sawmill for over three decades. I've spent many days hiking and hunting the forests, the muskegs and the alpine of Gravina.

I'm particularly concerned with state plans for its recently designated state forests for several reasons: 1) Our property at Vallenar Point abuts state land; 2) Forests that I've spent years walking through while hunting and hiking on Gravina have been logged under the auspices of



the State Forest Practices Act and left considerably diminished; 3) I've seen no assurances that the state has any intention of promoting primary processing of timber within the communities closest to that timber; 4) Alaska's recent governors, legislators and their appointees have shown little inclination to pay any heed to public comments on past area plans, especially if those comments run counter to the pro-growth political whims of elected officials.

I hiked through several of the Mental Health lands on both Gravina and Revilla after they were recently logged. I found logging slash; tops, limbs, discarded snags and abandoned merchantable logs obstructing what were previously passable routes through the forest. Due to the logging, these places became as impassable as blowdowns or landslide debris fields, and will remain so for years if not decades. Places that previously had been nice terrain to hike and hunt in have been turned into scenes of apparently unrestrained industrial exploitation, subject to the expediency of getting out the cut.

A few years ago when overtaken by darkness on the trail into Bear Valley from Minerva ridge behind Ketchikan I had to deal with the disorientation of being forced off the trail to get around trees that had been felled and abandoned in that helicopter-logged Mental Health parcel. An administrator of the project had the gall to report that the loggers had done an exceptional job of cleanly and thoroughly extracting the available merchantable timber from the logging units. Other local public officials have demonstrated their indifference to the significant impacts on helicopter logged areas by gushing that one could barely tell the place had been logged when viewed from a mile or more away.

Lack of responsible stewardship by loggers became readily apparent to me several years ago while hunting the muskegs under the helicopter flight path of a logging operation at KPC's property on Cleveland Peninsula. In that barging operation the bundled limbs and tops cleaned up from the barge were simply dropped onto USFS land underlying the return route to the KPC parcel.

***Unless specific timber sale contract language dictates otherwise I see little evidence that future timber extractions will be any cleaner and less wasteful than what's already happened.***

Regarding the Vallenar Bay area; I believe most of the existing logging and road building were done before we started our Vallenar Point homestead in the spring of 1956. The more recent Bostwick Lake road would need some kind of exemption to cross Federal land protected under the Roadless Rule to connect to the old alder-choked Vallenar Bay road.

The 1950s cuts left a narrow band of virgin old growth between the clearcuts uphill from the mouth of Vallenar Creek. I and other deer hunters have used this relatively open timber as well as a similar band of open heavy timber farther west for easy access to the higher muskegs and alpine ridges west of High Mountain. ***I see no indication in the PBIF that DOF has any interest in excluding these bands of very merchantable trees from the chainsaw.***

The clearcuts themselves, within a few years after they were logged, regenerated into thick brush and later into canopied-over young growth with dark and dead understory, difficult to hike through and unproductive for hunting. Several landslides have occurred in some of the steeper clearcuts.

Depending on tides, the dredged-out area at the Vallenar Bay log dump made a fair temporary place to anchor a skiff for several hours of deer hunting. A small indentation in the shoreline farther west also offered some protection from north winds when accessing that piece of open timber. Due to land sales within the last couple of decades both skiff anchorages may involve crossing private land to reach the hunting areas farther inland.

I would strongly suggest the following regarding state lands near Vallenar Bay specifically and state forests generally:

Leave an unlogged public access right of way and enough surrounding trees to present a buffer against blow down for the afore-mentioned bands of old growth.

Consider the cumulative impacts from logging. Many of the designated state forests adjoin or lie in close proximity to lands that have already been heavily logged. Consider the likelihood of more landslides on steep hillsides already destabilized by previous logging.

The second growth trees in the old Vallenar Bay clearcuts still have several decades to reach their most productive growth and mean annual increment, and several decades more to begin to become anything close to resembling quality old growth wildlife habitat. What happened to the hundred-year rotation scenario that Vallenar Bay was ostensibly logged under when USFS owned the land before statehood? I'm afraid shortening rotations to revive a timber industry plagued by unsustainable scale is doomed to failure.

I understand that while Viking Lumber on POW has the capability to mill small logs they have not done that for sometime because of the volatility of the markets for small log products. They simply cannot compete with the vast volumes of small log products coming out of Canada or the privately owned tree farms of the western states. So Viking lumber targets high quality old growth suitable for manufacturing piano sounding boards and other high end products.

Several years ago at a boat show in Seattle I overheard a trawler captain boast that he could take the whole groundfish quota of SE Alaska with his one boat. More recently we hear of Bering Sea trawlers possibly taking the whole halibut quota there, as bycatch, leaving nothing for the local small boat longline fleet. It's been looking for some time like a similar situation happens in the timber industry where a few token high end spruce, cedar and hemlock might get routed to Viking, some table scraps to other smaller operators and the rest shipped off to the plethora of small mom and pop mills in Japan and elsewhere in the far east.

Clearcutting eliminates cavity nesting and den-building habitat for bears, birds, and smaller mammals. Furthermore, recent revelations concerning global climate suggest that carbon stored in old growth forests should be kept stored in those forests. Clearcutting could hardly be considered carbon storage, nor could cutting trees down to produce biofuels.



While predators like wolves and goshawks have been historically maligned, the wholesale destruction of their habitat is inappropriate management. Adding roads and more fragmentation to a region already fragmented by islands and muskegs and previous clearcuts upsets the predator/prey dynamic between predators, including humans, and deer.

A road connecting the Ketchikan road system to Vallenar Bay timber sales will assure that Vallenar Bay will lose its already shaky subsistence priority status. As for “need” of roaded access, people have lived for decades in remote areas of Alaska without roads. My mother lived virtually full time for the last fifteen years of her life at Vallenar Point with only a 14’ skiff to boat to town for supplies. If some people can’t live comfortably without a road to their door they should consider relocating to the numerous places that have road access.

I’m told there are a couple dozen small Mobile Dimension mills in Ketchikan alone, over 300 in SE Alaska. There are other brands of small mills as well. If a majority of the volume and value of timber logged from state lands cannot be at least primarily processed in or near the community closest to that timber the trees should be left standing.

Furthermore, yellow cedar is already dying off in many areas allegedly due to climate change. Some have suggested that only standing dead yellow cedar should be harvested. As a small mill owner I get numerous requests for yellow cedar for all kinds of uses from bent wood box construction to masks, totems, bowls, paneling, decks, house beams, and boat timbers. From my perspective there should be an outright ban on round log yellow cedar export from any lands in Alaska.

The negative impacts of extensive helicopter logging, clearcutting and road building are already evident on Gravina. For helicopter-logged units, the logging slash should be cut up and spread around so it doesn’t present obstacles to hikers and wildlife. Unfortunately, the already high costs of logging in remote SE Alaska, coupled with attempts to compete with vastly larger tree farms of “lower 48” and Canada as well as other parts of the world likely precludes spending any time cleaning up the mess. (I mention helicopter logging in part because of a statement in ADFG habitat division’s comments on a previous USFS Gravina DEIS. “In the state’s experience, having an open road increases the likelihood of additional entries”{attachment p6}. I would expect once a road was

built, in short order a landing would be made so loggers could helicopter, or perhaps access with a spur road, timber from the forest west of this proposed Vallenar sale.)

In SE Alaska there are few if any natural events like wild fires or wind throw that rival the size of modern clearcuts and subsequent volume of wood removal from forests here. Clearcuts, other than those to stop rampant insect or tree disease should be small enough to mimic natural disturbances or wind events. To discourage waste, merchantable timber felled and left in the woods should be scaled post logging and added to the stumpage paid by the entity that purchased the sale. Again, if the tree can't be used then don't cut it down. If OSHA requires trees to be removed for safety then consider leaving a buffer of standing timber around the hazard tree.

For decades, timber management in SE Alaska has followed a boom/bust cycle, in large part because the markets compatible with large-scale extraction are far away. Additionally, other parts of the world, for example Canada and the tree farms of the "lower 48" have a vast competitive edge. Transferring forest ownership from the Federal government to the State will not change that fact.

The foregoing would suggest that timber extractions on Gravina and indeed on any forests in SE Alaska should be kept small and localized. They also suggest this sale and road project are not, as claimed by the PBIF, in the "best interest" of the State of Alaska.

Please enter these comments into the permanent public record.

Thank you and sincerely:

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